

Request for Extension of Compliance
40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants
Brick and Structural Clay Products Manufacturing Source Category

I. General Information**A. Facility Information**

Facility Name **Glen-Gery Corporation – Capitol Plant**
Facility Street Address **9905 Godwin Drive, Manassas, VA 20110**
Facility Local Contact Name Title Phone (OPTIONAL)
Chris Bagley Plant Manager (703) 368-3178
City State ZIP Code
Manassas Virginia 20110
Operating Permit Number (OPTIONAL) Facility I.D. Number (OPTIONAL)
NRO70244 51-683-00003
Responsible Official's Name/Title
John Vrobel/Vice President of Production
Street Address (if different from Facility Street Address)
1166 Spring Street
City State ZIP Code
Wyomissing PA 19610

B. Indicate the relevant standard or requirement for which you request a compliance extension:

Title 40, Part 63, Subpart JJJJJ (National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing).

II. Timeliness of Request

Pursuant to 40 C.F.R. Part 63, Subpart A, sources must submit requests for extension of compliance with a National Emission Standards for Hazardous Air Pollutants no later than 120 days prior to the affected source's compliance date (unless the elements are met for an alternative submittal date, as outlined in 40 C.F.R. § 63.6(i)). This request:

- ☒ (1) is being submitted on or before August 28, 2018 (120 days before the compliance deadline of December 26, 2018); or
- ☐ (2) is being submitted after August 28, 2018 but before December 26, 2018, because the need for the compliance extension arose after August 28, 2018, and the need arose due to circumstances beyond reasonable control of the owner or operator. An addendum may be included to explain the reasons for the delay in submittal.

Note: A nonfrivolous request under (1) will stay the applicability of the rule as to the emission points in question until the request is granted or denied. A denial will be effective as of the date of denial or the original compliance date, whichever is later. A nonfrivolous request under (2) will stay the applicability of the rule as to the emission points in question until such time as the request is granted or denied.

III. Eligibility

Are you eligible to apply for a compliance extension because you are unable to comply with the relevant standard by December 26, 2018 and need additional time for installation of controls (which includes time to achieve area source status)? 40 C.F.R. § 63.6(i)(4)(i)(A).

☒ Yes ☐ No

The statutory authority for compliance extensions under Clean Air Act Section 112(i) includes adopting controls or limits necessary to qualify as a “synthetic minor” or “area” source.

IV. Compliance Schedule Information

- A. Select the applicable approach described below (Option 1 or 2) that will be taken by your facility to achieve compliance within one year of the compliance date for the relevant standard (including, if applicable, actions necessary for your facility to qualify as a synthetic area source). 40 C.F.R. § 63.6(i)(6)(i)(A). At your option, you may provide additional detail in an attachment to this form.

☐ **OPTION 1:** This facility intends to install controls to reduce emissions to the level of the applicable standard and will be applying for a state minor NSR construction permit, if required by the state regulations, to install the controls. If your compliance approach involves installing physical controls, undertaking material substitution, or some other method, you may wish to describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as if EPA revises the NESHAP such that compliance can be achieved by the facility without the need to install controls.

☒ **OPTION 2:** This facility needs additional time to become an area source. This facility has submitted or will submit a permit application seeking an area source level emission limit, such that it will not be subject to the NESHAP. If you are installing physical controls, undertaking material substitution, or restricting operations to become an area source, you may describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as a request to eliminate any such limitation that has been issued if EPA revises the NESHAP such that compliance can be achieved by the facility without the need for an area source permit.

- B. Describe your compliance schedule. 40 C.F.R. § 63.6(i)(6)(i)(B)(1)-(2).

1. My facility has submitted an application to become synthetic minor dated October 04, 2017.

☒ Yes ☐ No

2. If compliance is to be achieved through a means other than becoming an area source, the facility will begin on-site construction, installation of emission control equipment, or initiate a process change within 30 days of obtaining any required permits for such action. 40 C.F.R. § 63.6(i)(6)(i)(B)(1). *If no permits are required for such action*, the facility will initiate the activities as applicable by the dates specified below:

☐ On-site construction Date: [Click here to enter text.](#)

☐ Installation of controls Date: [Click here to enter text.](#)

☐ Process change Date: [Click here to enter text.](#)

☐ Application for _____ Date: [Click here to enter text.](#)

Comments (OPTIONAL):

An application to become a Synthetic Minor has been submitted (October 04, 2017) and confirmed receipt by the Commonwealth of Virginia Department of Environmental Quality (November 13, 2107)

3. Any restriction on emissions, on-site construction, installation of emission control equipment, or a process change will be completed by December 26, 2019. 40 C.F.R. § 63.6(i)(6)(i)(B)(1).

Comments (OPTIONAL):

[Click here to enter text.](#)

4. Specify the date by which final compliance is to be achieved. 40 C.F.R. § 63.6(i)(6)(i)(B)(2).

Date: **By December 26, 2019.**

Comments (OPTIONAL):

Synthetic Minor Application approval by VaDEQ is unknown at this time.

- C. You may provide additional information regarding your method of achieving compliance in an attachment to provide a fuller description of your control strategy than outlined above, as appropriate.

V. Certification

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the information contained in this request is true, accurate, and complete.

Name of Responsible Official (Print or Type)

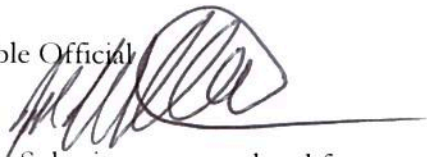
John Vrobel

Date

Title

Vice President of Manufacturing

Signature of Responsible Official



Submittal Instructions: Submit your completed form, and any addenda, to:

U.S. Environmental Protection Agency
Attention: Mr. Brian Storey
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
109 T.W. Alexander Drive, Mail Code: D243-04
Research Triangle Park, NC 27709

You may also wish to send a copy of this submittal to your state or local permitting authority. Be sure that the submittal is made by August 28, 2018 and that you retain proof of the date of submittal for your records.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

13901 Crown Court, Woodbridge, Virginia 22193

(703) 583-3800

www.deq.virginia.gov

Molly Joseph Ward
Secretary of Natural
Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

November 13, 2017

Mr. Chris Bagley
Plant Manager
Glen-Gery Corporation
9905 Godwin Drive
Manassas, Virginia 22110-0953

Location: Manassas City
Registration No. 70244

Dear Mr. Bagley:

This letter acknowledges receipt of your permit application dated October 4, 2017 and received by the Department of Environmental Quality (DEQ) on October 17, 2017 to construct and operate a Brick and Structural Clay at 9905 Godwin Drive, Manassas, Virginia. The DEQ Northern Regional Office staff has completed its initial review of your application. Based on that review, the proposed request has been determined to be subject to the permitting requirements of Chapter 80, Article 6 of the Virginia Regulations for the Control and Abatement of Air Pollution. Please note, however, that this determination is subject to change upon further review.

Based upon this initial review, the application contains sufficient information to begin the application review process.

If a later analysis of the permit application indicates that additional information is required to support your application, such information will be requested at that time.

You are reminded that construction of Brick and Structural Clay subject to the permitting requirements in Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution, without the appropriate new source review permit, can result in enforcement action.

If you have any questions or require assistance, please call me at {703} 583-3969.

Sincerely,

A handwritten signature in black ink that reads "Gary Beeson". The signature is written in a cursive style with a large, stylized 'G' and 'B'.

Gary Beeson
Environmental Scientist Sr II

hgb/70244/22-13-2017

cc: Ms. Sharon Sadler, All4, Inc.